

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR  
PUERTO RICO, as representative of

THE COMMONWEALTH OF  
PUERTO RICO, *et al.*

Debtors,<sup>1</sup>

PROMESA

Title III

No. 17-BK-3283 (LTS)

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR  
PUERTO RICO, as a representative of

PUERTO RICO HIGHWAYS AND  
TRANSPORTATION AUTHORITY,

Debtor.

PROMESA

Title III

No. 17-BK-03567 (LTS)

**MOTION TO INFORM APPEARANCE OF THE AD HOC GROUP OF FGIC  
INSURED NOTEHOLDERS AT JUNE 17, 2022 DISCLOSURE STATEMENT  
HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain:

Taconic Capital Advisors LP, Aurelius Capital Management, LP, Canyon Capital

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<sup>1</sup> The Debtors in the various Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567- LTS) (Last Four Digits of Federal Tax ID: 3808); Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Advisors LLC, and First Ballantyne LLC (collectively, the “Ad Hoc Group of FGIC Insured Noteholders”)<sup>2</sup> by and through its undersigned counsel, hereby respectfully submits this motion to inform (the “Informative Motion”) pursuant to the *Order Regarding Procedures For June 17, 2022 Disclosure Statement Hearing* [ECF No. 1192] (the “Procedures Order”),<sup>3</sup> and respectfully states as follows:

1. Lawrence A. Larose of Sheppard Mullin Richter & Hampton LLP will appear on behalf of the Ad Hoc Group of FGIC Insured Noteholders at the June 17, 2022 hearing (the “Hearing”), which will be conducted via Zoom in accordance with the Procedures Order. As required by the Procedures Order, a Party Appearance Sheet is annexed hereto as Exhibit A.

2. Mr. Larose, on behalf of the Ad Hoc Group of FGIC Insured Noteholders, reserves the right to be heard and present oral argument at the Hearing related to any matter (i) identified in the agenda to be filed by the Oversight Board in connection with the Hearing, or (ii) raised by any party at the Hearing related to the Title III cases which may affect the interests of the Ad Hoc Group of FGIC Insured Noteholders. The Ad Hoc Group of FGIC Insured Noteholders further reserves the right to amend this Informative Motion as needed.

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<sup>2</sup> Each member of the Ad Hoc Group of FGIC Insured Noteholders files this Informative Motion exclusively on its own behalf and does not assume any fiduciary or other duties to any other member or to any other entity or individual.

<sup>3</sup> Capitalized terms not defined herein shall have the meanings ascribed to them in the Procedures Order unless otherwise noted.

Dated: June 8, 2022

Respectfully submitted,

CÓRDOVA & DICK, LLC

/s/ Brian M. Dick Biascoechea

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*Local Counsel to the Ad Hoc Group of  
FGIC Insured Noteholders*

- and -

SHEPPARD MULLIN RICHTER & HAMPTON LLP

/s/

Lawrence A. Larose (admitted pro hac vice)  
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Facsimile: (917) 438-6197

*Counsel to the Ad Hoc Group of FGIC Insured  
Noteholders*

**CERTIFICATE OF SERVICE**

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notifications of such filing to all CM/ECF participants in this case.

CÓRDOVA & DICK, LLC

/s/ Brian M. Dick Biascoechea

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*Local Counsel to the Ad Hoc Group of FGIC Insured  
Noteholders*

**Exhibit A**

**PARTY APPEARANCE SHEET**

Name of Party	Ad Hoc Group of FGIC Insured Noteholders
<b>Pro Se Appearance</b> <ul style="list-style-type: none"> <li>• Do you require an interpreter? [Yes or No]</li> <li>• Email Address</li> <li>• Phone Number</li> <li>• Proof of Claim Number (if any)</li> </ul>	
<b>Attorney Appearance</b> (provide the listed information for each attorney who may appear for the Party): <ul style="list-style-type: none"> <li>• Party Name Abbreviation (For Use with Zoom)</li> <li>• Name,</li> <li>• Email,</li> <li>• Law Firm,</li> <li>• Phone Number,</li> <li>• Docket Entry No. for the Attorney's Notice of Appearance</li> <li>• Zoom Screen Name (See Disclosure Statement Hearing Procedures Order, ¶ 7(a))</li> </ul>	Ad Hoc Group  Lawrence A. Larose  LLarose@sheppardmullin.com  Sheppard Mullin Richter & Hampton LLP  (212) 896-0627  [Doc. No. 16976]  Ad Hoc Group/ Larose, Lawrence/ Sheppard Mullin Richter & Hampton LLP
If a Party files a supplemental Party Appearance Sheet, the Party must include the Docket Entry No. of the original appearance sheet in the new filing which must be clearly marked as a "Supplemental" Party Appearance Sheet.	
<b>Note:</b> Pursuant to the Disclosure Statement Hearing Procedures Order ¶ 1, the Financial Oversight and Management Board for Puerto Rico and the Puerto Rico Fiscal Agency and Financial Advisory Authority shall each be limited to 4 attorneys appearing in the Zoom session at any given time, and each other counsel shall be limited to 2 attorneys at any given time.	